KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.
SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3209

(202) 326-7900
FACSIMILE:
(202) 326-7999

March 24, 2003

Ex Parte Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

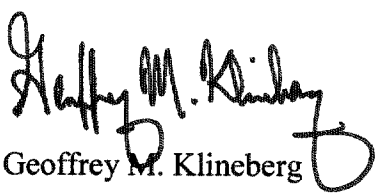
Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Michigan*, WC Docket No. 03-16

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), and at the request of FCC Staff, I am attaching to this letter SBC's responses to additional questions received from Staff, relating to line-splitting, versioning, and some miscellaneous issues arising out of SBC's responses to prior questions. See Attachment.

In addition, Dorothy Attwood of SBC had a conversation with Jeff Carlisle on Friday, March 21, about various issues, including data integrity, change management, and billing. In accordance with this Commission's Public Notice, DA 03-156 (Jan. 16, 2003), SBC is filing this letter and attachment electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,



Geoffrey M. Klineberg

Attachment

cc: John P. Stanley
Gina Spade
Russ Hanser
Michael Engel
Marcus Maher
Denise Coca
Susan Pié
Layla Seirafi-Najar
Dorothy Wideman
Ann R. Schneidewind
Qualex International

Attachment

SBC'S RESPONSES TO ADDITIONAL QUESTIONS FROM FCC STAFF RELATING TO LINE-SPLITTING, VERSIONING, AND SOME MISCELLANEOUS ISSUES

1. Please provide a response to AT&T's March 19, 2003, line splitting ex parte. Please include a response to the Trading Partner ID versioning issue.

AT&T's Ex Parte dated March 19, 2003 raises a few concerns relating to Michigan Bell's policies and practices that support line splitting.[1] First, AT&T alleges that Michigan Bell's processes for converting an existing line splitting situation back to UNE-P are discriminatory. Second, AT&T claims that Michigan Bell's processes for converting line sharing to line splitting are not ready or reasonable. Third, AT&T repeats its concern that Michigan Bell's versioning model, which is at the "OCN" level, rather than the "TPID" level is discriminatory and will preclude AT&T and Covad from line splitting at commercial volumes. Finally, AT&T again raises concerns regarding BearingPoint's line splitting evaluation.

AT&T's concerns are without merit. Before responding to these *specific* issues, which for the most part are being raised for the first time by AT&T in this Section 271 proceeding, it is helpful to put these operational concerns and AT&T's actions in the proper perspective given the line splitting collaborative discussions that have occurred in the past, that are now on-going in Michigan.

Background – Michigan Line Splitting Collaborative Discussions

The two specific line splitting scenarios raised in AT&T's March 19, 2003 Ex Parte were not identified by AT&T as significant commercial issues in either 2001, 2002 or 2003, until just this month in this proceeding. For example, in 2001, during collaborative discussions initiated by the MPSC Staff, AT&T briefly discussed and did not pursue further in written comments the conversion of line splitting to UNE-P.[2] The MPSC's December 20, 2001 Order[3] directed the parties to continue collaborating on line splitting issues. Although the two line splitting scenarios raised in AT&T's March 19, 2003 Ex Parte were briefly discussed during the Michigan 2002 line splitting collaborative sessions, the parties recognized that these scenarios were not priorities. Instead, the parties agreed to focus the 2002 collaborative discussions on four scenarios – none of which involved the two scenarios

[1] AT&T's March 19, 2003 Ex Parte was supported by a Supplemental Declaration of Sarah DeYoung and Timothy M. Connolly ("DeYoung/Connolly Supp. Decl."). It was filed in response to SBC's Joint Reply Affidavit of Carol Chapman and Mark J. Cottrell (Reply App., Tab 4), and the Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 17, 2003) ("March 17 Ex Parte"), including Att. A, at 13-15 (versioning) & 18-19 (new loop required for line splitting to UNE-P).

[2] During discussions in June 2001, AT&T raised the "UNE-P to Line Splitting" scenario. However, this particular scenario was not subsequently addressed by AT&T or others in the comments and replies filed in MPSC Case No. U-12320 on Michigan Bell's checklist informational filing.

[3] *See* Opinion and Order, MPSC Case No. U-12320, at 11 (December 20, 2001)(App. C, Tab 55).

that are the subject of AT&T's Ex Parte – that had the most commercial significance at the time.

The MPSC's October 3, 2002 order resolved disputes that resulted from these four line sharing/line splitting scenarios.[4] On December 11, 2002, Michigan Bell filed an Amended Compliance Plan implementing the MPSC's October 3, 2003 order with respect to these four scenarios.[5] On January 13, 2003, the MPSC approved Michigan Bell's Amended Plan.[6] In addition, the "Report of the Michigan Public Service Commission," dated January 13, 2003, the MPSC concluded that the implementation of this plan "will permit SBC to satisfy its line splitting obligations."[7] The MPSC recognized, however, that additional line splitting scenarios may warrant further collaborative discussion and accordingly provided CLECs with the opportunity to raise new scenarios for additional collaborative discussion. The MPSC stated: "[T]he collaborative discussion scheduled for March 4, 2003 shall include discussion of line sharing/line splitting issues that exist at that time. The CLECs should identify those issues by February 13, 2003."[8]

On February 13, 2003, AT&T sent the following e-mail in response to the MPSC's request for new line splitting scenarios beyond the four already resolved by the MPSC:

> In response to your email and its request "to identify line sharing/line splitting scenarios by February 13, 2003," it is our understanding that the collaborative will not be discussing the four scenarios upon which the Commission has now made findings, *and AT&T/TCG Detroit do not have new scenarios to identify presently*. To the extent that SBC Michigan fails to comply with its line sharing/line splitting/HFPL obligations under applicable law, AT&T will seek appropriate redress for such failures.[9]

Thus, despite being given the opportunity, AT&T failed to identify *any* new line sharing/line splitting scenarios to be addressed in the industry collaborative as requested by the MPSC. If AT&T were interested in working with Michigan Bell to resolve any actual operational issues involving Michigan Bell's line splitting policies and practices, one would have expected AT&T to have identified those specifics before the March 4-5, 2003 collaborative meeting so that a productive discussion could have taken place.

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[4] *See* Opinion and Order, MPSC Case No. U-12320 (October 3, 2002)(App. C, Tab 103).

[5] *See* Amended Compliance Plan as Required by October 3, 2002 Opinion and Order, MPSC Case No. U-12320 (Dec. 11, 2002)(App. C, Tab 126) ("Amended Compliance Plan").

[6] *See* Opinion and Order, MPSC Case No. U-12320 (Jan. 13, 2003) (App. C, Tab 134) ("January 2003 Compliance Order").

[7] *See* Report of the Michigan Public Service Commission, MPSC Case No. U-12320, at 88 (Jan. 13, 2003)(App. C, Tab 133).

[8] *See* January 2003 Compliance Order at 11.

[9] E-mail from John J. Reidy, III, AT&T, to Ann R. Schneidewind, MPSC Staff, et al. (Feb. 13, 2003) (attached as Exhibit 1) (emphasis added).

In any event, WorldCom did request further discussions with respect to additional line splitting scenarios. In response to WorldCom's request, SBC circulated a document entitled *Additional Line Splitting/Line Sharing Scenarios Per MPSC January 13, 2003 Order in U-12320* dated March 3, 2003.[10] Both of the scenarios discussed in AT&T's March 19 Ex Parte are addressed in this *March 3 Discussion Draft*.[11]

AT&T, however, failed to engage in any meaningful discussion on either scenario at the collaborative meetings held in Lansing, Michigan on March 4 and 5, 2003, other than to claim that SBC's processes did not work for line sharing to line splitting where there was a change of splitter. On March 12, 2003, SBC circulated its findings on that issue, which are discussed in more detail below.

Most recently, on a March 19, 2003, collaborative line-splitting conference call in Michigan, AT&T refused to discuss any line-splitting issues. In particular, AT&T declined to discuss the operational issues raised in its March 19, 2003 Ex Parte filed in this proceeding. Rather, AT&T stated that it was not interested in asking Michigan Bell "operational" questions about any of these line splitting/line sharing issues. Instead, according to AT&T, it would rather have such issues resolved by "the FCC" – referring, obviously, to this 271 proceeding.

Of course, Michigan Bell recognizes that AT&T's business plans may change. Accordingly, Michigan Bell has implemented and documented processes (for line sharing to line splitting, line splitting to UNE-P, and versioning) that should already accommodate AT&T's new plans. If AT&T believes these existing processes do not accommodate its current or future business plans, SBC is ready and willing to discuss these new issues with AT&T in future collaborative sessions or one-on-one through the companies' account teams. Certainly, the regulatory game that AT&T appears to have chosen here is neither the preferred nor a productive approach, and it has no impact on Michigan Bell's satisfaction of its line splitting checklist obligations. As this Commission has repeatedly found, a section 271 application is not the proper forum to address and resolve such issues, especially when the state commission has an on-going industry collaborative to do just that.

1. Line Splitting to UNE-P. AT&T raises three issues with respect to SBC's polices for converting a line splitting arrangement to UNE-P: discrimination, operational concerns, and pricing.

Discrimination Claim. AT&T claims that Michigan Bell's "no-reuse" policy – meaning that it does not "re-use" the xDSL-capable loop used in a line splitting arrangement, but rather requires the purchase of a voice grade loop in a line splitting to UNE-P arrangement -- is

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[10] *See* SBC's Discussion Draft, *Additional Line Splitting / Line Sharing Scenarios Per MPSC January 13, 2003 Order in U-12320* (Mar. 3, 2003) ("*March 3 Discussion Draft*") (attached as Exhibit 2); *see also SBC Michigan's 271 Line Sharing/Line Splitting Collaborative Clarifications* (Mar. 12, 2003) (attached as Exhibit 3).

[11] *See March 3 Discussion Draft* at 7-8 (Scenario #8: "Line Splitting to UNE-P"); *id*. at 2-3 (Scenario #5: "Line Sharing to Line Splitting-Change in Splitter"). SBC's December 11, 2002 Amended Plan addressed Line Sharing to Line Splitting where there was no change in splitter. *See* Amended Compliance Plan, Scenarios # 1 and #3.

without valid justification and is discriminatory.[12] The justification and rationale for this policy has been fully explained by Michigan Bell.[13]

AT&T's discrimination claim is without merit because it equates line sharing and line splitting. However, the two situations are quite different and that is why the "no-reuse" policy is different. Contrary to AT&T's assertions, Michigan Bell's xDSL loop "re-use" policy is the same regardless of whether the conversion is to wholesale or retail voice service. Specifically, if Michigan Bell wins a voice customer that is being served by a CLEC over an xDSL loop that is used in a line splitting arrangement, Michigan Bell establishes a new voice grade loop to serve that customer. That is because, as in the case of converting line splitting to UNE-P, Michigan Bell has no assurance that an xDSL-capable loop meets Michigan Bell service quality standards for a voice-grade loop. AT&T should have known this, because this precise issue was addressed in the material provided by SBC in advance of the March 4 & 5, 2003 Michigan line splitting collaborative meeting. In its *March 3 Discussion Draft*, SBC noted that in a winback from a line splitting arrangement, "[i]f the end user wishes to return to SBC Michigan for voice services, SBC Michigan provisions that service over a new, voice grade loop."[14] Michigan Bell follows this same policy when it wins a voice customer that is being served over an xDSL capable UNE-L, Michigan Bell provisions a new voice grade loop (rather than reusing the existing loop) to serve that customer.[15]

In an attempt to create the appearance of discrimination, AT&T engages in an "apples-to-oranges" comparison, when it asks why, in a *line sharing* situation, Michigan Bell continues to use the existing loop to provide its voice service after the data service is no longer provided over the high frequency portion of the loop (*i.e.*, the HFPL is disconnected). The answer here is simple: Michigan Bell knows that the loop used in a line sharing arrangement meets Michigan Bell's technical standards for a voice grade loop – because the loop was, in fact, being used to provide Michigan Bell voice service and either Michigan Bell's advanced service affiliate, AADS, or another data CLEC is providing xDSL service over the high frequency portion of the loop (HFPL). Indeed, Michigan Bell's terms and conditions for line sharing do not allow the data CLEC to order conditioning on a line shared loop that would make the loop unsuitable for Michigan Bell voice service. In contrast, as Michigan Bell explained in its March 17, 2003 Ex Parte, a data CLEC that orders an xDSL-capable loop for a particular address has the right to condition the loop as it sees fit and may have conditioned it to a point that makes the loop unsuitable for Michigan Bell voice service (this is true regardless of whether or not the CLEC intends to use the xDSL capable loop as part of a line splitting arrangement). Therefore, Michigan Bell does not simply "reuse" an existing xDSL capable loop supporting a line splitting arrangement if one of the partnering CLECs seeks to reestablish a UNE-P to the address in question.

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[12] DeYoung/Connolly Supp. Decl. ¶¶ 4, 11-15.

[13] *See* March 17, 2003 SBC Ex Parte, Att. A, at 18-19.

[14] *See March 3 Discussion Draft* at 4 (Scenario #6).

[15] If the loop is a 2-wire analog loop (not an xDSL-capable loop), Michigan Bell would attempt to reuse that loop in a migration to Michigan Bell analog voice service if the Michigan Bell has received and processed a disconnect notice from the CLEC than had been leasing it.

AT&T further alleges that Michigan Bell practices are discriminatory because a loop may be re-used when AADS disconnects the HFPL. As shown above, there is valid justification for the different "re-use" policy for line sharing and line splitting. In any event, the relevant inquiry is whether Michigan Bell treats AADS any differently than it treats unaffiliated data CLECs that use the HFPL in a line sharing arrangement. The answer is that it does not. Michigan Bell's policies and practices in both line sharing and line splitting are nondiscriminatory. More to the point, and contrary to AT&T's underlying premise, there is no requirement that all policies and practices with respect to line sharing must "mirror" those of line splitting. Michigan Bell's line sharing and line splitting policies and practices are justifiable in that they recognize the inherent difference between the two arrangements. AT&T has presented no evidence to suggest otherwise.

Operational Concerns. AT&T now alleges that there is "no guarantee" that Michigan Bell's single LSR process for stand-alone ULS-ST switch port to UNE-P (*e.g.* line splitting to UNE-P) "will work."[16] However, AT&T does not present any evidence that this process will not work, but rather complains that certain documentation is not available.

AT&T again misstates the facts. Michigan Bell's single LSR process for CLEC orders going from ULS-ST to UNE-P has been available on CLEC Online since 2001. CLECs informed Michigan Bell at the March 4-5, 2003 collaboratives that the hyperlink to the LSR examples for this scenario on CLEC Online was not operational. Michigan Bell thus provided an LSR to the collaborative participants on March 12, 2003 and has since corrected the hyperlink for retrieving the LSR example on CLEC Online**.** Michigan Bell believes that a CLEC should be able to successfully submit an order under this process with the documentation provided.

AT&T also notes that the process is manual at this time.[17] The process is manual because this is a process that is not currently being utilized by CLECs in any of the SBC Midwest states in any material quantity. Nonetheless, if AT&T believes that these enhancements to this order process are necessary for future business plans it may have, AT&T is free to pursue this through Change Management. AT&T is also free to discuss this issue in the Michigan collaboratives and *work with Michigan Bell* to make the process better. However, since this proceeding was filed, AT&T has shown no interest in doing so.

Pricing Concern. Finally, AT&T challenges Michigan Bell's $20 non-recurring charge ("NRC") for provisioning a voice-grade loop as part of a line splitting to UNE-P conversion.[18] This is the non-recurring charge for establishing a new UNE-P. There is no difference in the charges applied for a new UNE-P purchased by a CLEC initially or for a new UNE-P

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[16] DeYoung/Connolly Supp. Decl. ¶¶ 6-10. Interestingly, AT&T first alleged in its comments on this application that Michigan Bell required it to issue three service orders to convert from a line splitting scenario to UNE-P, and that the customer would be out of service. In its reply comments and affidavits, Michigan Bell explained that, in fact, it had a single order process to accomplish this conversion, and the customer would not experience any lengthy outage. AT&T has now seemed to retract these false allegations. AT&T made the same allegations to the DOJ. *See* DOJ Evaluation, at n. 58

[17] DeYoung/Connolly Supp. Decl. ¶ 10.

[18] *Id*. ¶ 12.

purchased when a CLEC decides to convert from a line splitting arrangement when the data is being eliminated from an end-user's current service and the involved CLEC or CLECs no longer desire the port connected to a collocation arrangement. In each case, there is work required on Michigan Bell's part to establish a voice grade loop. These charges have been approved by the MPSC its November 7, 2002 Order and are less than the charges approved by the MPSC for the UNE-P to line-splitting scenario.[19]

2. Line Sharing to Line Splitting. AT&T also raises three issues with SBC's polices for converting a line sharing arrangement to a line splitting arrangement: documentation, operational concerns, and pricing.

Documentation. AT&T suggests that because the line sharing to line splitting scenarios discussed in Michigan Bell's December 11, 2003 Amended Compliance Plan were limited to the situations where there was no change in data CLEC or splitter, that Michigan Bell's CLEC Online documentation for line sharing to line splitting orders contains the same limitation.[20] This is simply not the case.

Michigan Bell's Amended Compliance Plan was limited in scope because, consistent with the MPSC's directive, it was intended to address only the four scenarios agreed upon in the Michigan line splitting/line sharing collaborative. Michigan Bell's CLEC OnLine documentation, on the other hand, includes documentation for order scenarios not included in the Amended Compliance Plan. Michigan Bell developed a workable process for line sharing to line splitting requests in 2001. Michigan Bell's CLEC OnLine documentation has provided information on this scenario since October 2001. This particular activity is listed as Line Splitting Scenario #3. Although the scenario discussed in the Michigan line splitting/line sharing collaborative (and documented in the Amended Compliance Plan) was limited to the situation where there was no change in data provider or splitter, Line Splitting Scenario #3 documented on CLEC Online is not limited to this situation. Scenario #3 supports line sharing to line splitting with (1) no change in data provider or splitter; (2) no change in data provider, but new splitter (typically moving from ILEC-owned splitter to CLEC-owned splitter); and (3) change in data provider and splitter Michigan Bell detailed its processes and prices for a line sharing to line splitting, when there is a change in splitter during the March 2003 collaboratives. (This is Scenario #5 in the March 3, 2003 material provided to the Michigan collaborative, including AT&T.).

In short, the process described on SBC's CLEC website for converting line sharing to line splitting have addressed all the scenarios AT&T has shown any interest. These processes are well documented and operationally ready. They provide the necessary information needed

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[19] *See* Amended Compliance Plan, Scenario #4, which was approved by the MPSC on January 13, 2003. *See* January 2003 Compliance Order at 11; *see also* MPSC Case No. U-12320, Opinion and Order (Nov. 7, 2002) (App. C, Tab 121). The charges for this scenario (line splitting to UNE-P) are the service order charge ($3.16) and the installation charge ($17.82) for the loop, which total $20.98. This is the same as for a new UNE-P. *See* MPSC Tariff No. 20R, Part 19, Section 23, Sheets 6-7 and 9-11 (App. L, Tab 1, file "mi201923"). These charges were detailed in the *March 3 Discussion Draft* at 7-8 (Scenario #8b). If AT&T has a concern with these pricing issues, it is more appropriate to raise them with the MPSC in its on-going line splitting collaborative than in this proceeding.

[20] DeYoung/Connolly Supp. Decl. ¶¶ 17-20.

by a CLEC and/or a DLEC to obtain from Michigan Bell the UNEs that will enable them to successfully line split. To the extent a CLEC and/or a DLEC has questions on the process, or the process needs improvement, that is exactly what the MPSC expects the parties to work together to resolve during the line splitting/line sharing collaboratives.

Operational Concerns. During the March 5, 2003, line splitting collaborative meeting, AT&T announced that it had submitted a few test orders involving "Scenario 3" of SBC's CLEC Handbook, which describes Michigan Bell's 3-order process for converting line sharing to line splitting (not line splitting to UNE-P).[21] AT&T claimed that it used Michigan Bell's CLEC Online documentation for Scenario #3 to submit these "test" orders but, Michigan Bell's order process did not work and each order was rejected. Michigan Bell agreed to review these orders.

Michigan Bell's initial investigation revealed numerous AT&T errors. A subsequent investigation determined that although most of the rejections were caused by AT&T submitting improperly coded LSRs, there were some errors in Michigan Bell's online documentation that had not previously been identified, as no other CLEC had previously submitted orders for this scenario. As a result of this investigation, Michigan Bell updated its online documentation on March 20, 2003.

AT&T also asserts that Michigan Bell's three LSR process for converting line sharing to line splitting will not work "on a commercial basis" because of Michigan Bell's RPON policy.[22] As AT&T correctly acknowledges, CLECs have four hours from delivery of the first PON in any RPON arrangement to deliver all remaining PONs. This 13-state process was established as part of the Plan of Record collaborative with the input and agreement of AT&T. The process was documented in Accessible Letter CLECALL01-049 on December 13, 2001. *See* App. I, Tab 7. It is also clearly documented on CLEC Online today. The process applies to all related orders, and is not unique to orders involving line splitting. AT&T provides no valid reason why two telecommunications firms cannot communicate remotely or coordinate orders within a four-hour window. The fact that two gateways may be involved is irrelevant in the age of high-speed networking. As the MPSC found in its October 3, 2002 order, the voice and data CLEC must coordinate activities. There is nothing unreasonable with Michigan Bell's requirement that related orders in a line splitting arrangement be processed like any other related orders.

At the outset, AT&T's support for this proposition is its claims regarding its "Texas experience," which is of doubtful relevance to this Michigan 271 proceeding.

Pricing. Finally, AT&T claims that Michigan Bell's collection of a $24 NRC for line sharing to line splitting conversions is not "justified."[23] Again, AT&T fails to provide the proper context. Michigan Bell only imposes the $24 NRC in a line sharing to line splitting conversion when there is a change in splitter as a result of the conversion. The $24 NRC is

[21] DeYoung/Connolly Supp. Decl. ¶¶ 21-23.

[22] DeYoung/Connolly Supp. Decl. ¶¶ 24-25.

[23] *Id.* ¶ 27.

designed to reimburse Michigan Bell for its central office work in disconnecting an existing splitter and running the switch port and loop to a different location. This would occur if a different data CLEC is involved in the line splitting arrangement (*i.e.*, if the data CLEC in the line splitting arrangement is different from the data CLEC in the line sharing arrangement). It would also occur if the data CLEC remains the same, but was using a Michigan Bell-provided splitter in the line sharing arrangement (Michigan Bell does not provide splitters for line splitting). The $24 NRC does not apply if the data CLEC remains the same and it was using its own splitter in the line sharing arrangement, because the charge assumes that Michigan Bell will not have to perform any central office work to effectuate the line splitting arrangement in that scenario. When a CLEC does not request a change in splitter to effectuate a line sharing to line splitting conversion, the NRC is set at $.35 for the loop and port "installation".

This difference in NRC application is consistent with MPSC's orders issued on October 3, 2002 and January 13, 2003. In its October 3, 2002 Order, the MPSC required scenarios that were like UNE-P migrations to be priced as UNE-P migrations for the voice CLEC (i.e., the $0.35 for POTS service).[24] This applies to what is referred to as Scenarios #1 and #3 (Line Sharing to Line Splitting – No Change in Splitter) and Scenario #2 (Line Sharing to UNE-P) in SBC's Amended Compliance Plan.[25] For Line Sharing to Line Splitting – No Change in Splitter, the charges are based on the assumption that there is no physical work done. Rather, orders are placed to reflect in Michigan Bell's billing and provisioning systems that the HFPL is being "disconnected" and the ULS-ST port and xDSL-capable unbundled loop are being "installed." The DLEC will pay the service order charge to reflect the "disconnection" of the HFPL ($1.54) in Michigan Bell's systems. The V-CLEC or the DLEC (based on their arrangements) will pay the service order charge to establish the loop and port; per the MPSC's October 3, 2002 Order, that charge may only be the UNE-P migration charge.

However, the MPSC has approved the $24 NRCs for scenarios that require physical work. For example, Scenario #4 (UNE-P to Line Splitting) in Michigan Bell's Amended Compliance Plan recognizes that work must be physically done to disconnect the current loop and port being used to provision the UNE-P and then to connect the appropriate UNEs to the collocation cage containing the CLEC splitter and DSLAM. While the ULS-ST port can be "re-used," it must be determined if the loop that had been used for the UNE-P is xDSL capable per the CLEC's requirements for its service. If it is not, a different loop must be selected. Thus, service order charges to install the loop ($3.16) and the port ($3.02), as well as the loop qualification ($0.10) and loop connection ($17.82) charges are applied. The pricing applications in the Amended Compliance Plan were approved by the MPSC in its January 13, 2003 Order.[26]

The same NRCs should also apply in the Line Sharing to Line Splitting with change of splitter scenario raised by AT&T. As with the UNE-P to line splitting scenario discussed

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[24] *See, e.g.*, Order and Opinion, MPSC Case No. U-12320, at 15-16, 21, and 23 (Oct. 3, 2002) (App. C, Tab 103).

[25] *See* App. C, Tab 126.

[26] *See* January 2003 Compliance Order at 11.

above, this line splitting to UNE-P scenario also requires physical work to reconfigure the facilities that currently serve the end user. In any event, if AT&T believes the charges should be different, it should raise that issue in the first instance with the MPSC, rather than in this 271 proceeding.

3. Versioning. AT&T again claims that SBC's versioning is unreasonable and discriminatory. Specifically, AT&T alleges that because SBC implemented versioning at the "OCN" level, rather than the TPID level, AT&T and Covad "cannot offer on a joint basis" line splitting at commercial volumes. AT&T rejects the alternative solutions that SBC already offers, and instead demands that SBC be "required" to offer versioning at the TPID level. Contrary to AT&T claims, SBC's versioning approach does not violate Section 251 nondiscrimination requirements. Moreover, as SBC demonstrates, modifications to OCN versioning using other options, such as PON or TPID, are costly and time-consuming to implement,[27] and should be discussed on a business-to-business basis or though the 13 state Change Management Process ("CMP"), not as a brand new, unilateral cost of obtaining Section 271 approval.

SBC has already demonstrated that its versioning is consistent with all applicable Section 251 and 271 legal requirements. As this Commission has repeatedly recognized, a BOC's versioning model provides CLECs a meaningful opportunity to compete if it "ensure[s] that competing carriers are not forced to test and cut over to a new industry standard release prematurely." *New York Order* ¶ 110; *Georgia/Louisiana Order* ¶ 181 ("The Commission looks for mechanisms to ensure the timely and effective transition from one [interface] release to another, thus showing that competitors have a meaningful opportunity to compete.") (internal quotations marks omitted).[28] There can be no question that SBC's current versioning clearly meets that standard. Indeed, SBC's versioning – which supports three versions of software at all times, including 2 LSOG versions – provides CLECs ample time to prepare for new releases before having to switch over. Accordingly, this Commission has found SBC's versioning checklist-compliant in both the Arkansas/Missouri and California 271 applications. Thus, although SBC is willing to consider AT&T's versioning proposal, such a discussion is improper in the context of a section 271 proceeding. If AT&T wants SBC to undertake its versioning proposal, those negotiations should occur on a business-to-business level through the CMP.

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[27] Michigan Bell's March 17, 2003 Ex Parte estimated the cost to version at a PON level. This response also estimates the time and cost involved if versioning were changed to the Trading Partner ID. Although AT&T chides Michigan Bell for using a PON approach, this is the same approach that was requested by Covad, AT&T's partner for line-splitting. On February 18, 2003, Covad submitted a CMP Change Request requesting that versioning be implemented *at the PON level* (attached as Exhibit 4).

[28] *See also Kansas/Oklahoma Order* ¶ 167 ("We approve of SWBT's subsequent implementation and find that versioning enhances SWBT's change management plan by providing significant additional assurance that changes will not disrupt competing carriers' use of SWBT's OSS."); *Georgia/Louisiana Order* ¶ 181 ("We find that BellSouth's versioning process, which allows competing carriers to continue to use an old version of the interface after a new one is released, provides a mechanism sufficient to protect competing carriers from premature cut-overs and disruptive changes to their interfaces to BellSouth's OSS."); *Qwest 9-State Order* ¶ 140 ("Qwest's versioning process, which allows use of a prior SATE release even after implementation of a new release in order to provide flexibility on the timing of migrating to the new release, provides a sufficient mechanism to protect competing carriers from premature cut-overs and disruptive changes to their OSS interfaces.").

Contrary to AT&T's argument, the *Line Sharing Reconsideration Order* does not require TPID versioning.[29] Rather it merely provides that ILECS must provide "nondiscriminatory access to OSS necessary for pre-ordering, ordering, provisioning, maintenance and repair, and billing for loops used in line splitting arrangements."[30] SBC's OCN versioning meets that requirement. Based on these governing OSS principles, SBC offers OSS that allows CLECs to order network elements and collocation that enable them to engage in a line splitting arrangements, either alone or with multiple parties.

Moreover, even if this issue were properly considered in this proceeding, AT&T fails to explain exactly how its ability to compete is materially impacted. As explained in the opening affidavit of Mark Cottrell (App. A, Tab 6) and the joint reply affidavit of Mark Cottrell and Beth Lawson (Reply App., Tab 5), there are at least four viable alternatives that AT&T and its business partner Covad could adopt that would solve this business problem. AT&T fails adequately to explain why these solutions present a "practical impossibility" for AT&T.

For example, AT&T utterly fails to provide any evidence as to why neither AT&T nor Covad is capable of implementing either OCN versioning, or one of the viable alternatives available to both of them. In this regard, AT&T fails to acknowledge that LEX is not version specific; that with the proper codes one partner can easily issue orders for the other; and that a CLEC's input can be extracted so that a CLEC using EDI can integrate this information into its back office systems.[31] Likewise it is not credible to argue that it is "impossible" for a DLEC to operate on multiple versions or to use a service bureau to send transactions on its behalf. CLECs currently doing business in multiple regions, across multiple versions of OSS interfaces provided by various ILECs, operate on multiple versions themselves day-in and day-out. Thus, a DLEC clearly is capable of sending the one-order type at issue using the same EDI LSOR version as AT&T's.[32] Additionally, contrary to AT&T's suggestion, service bureau providers are capable of sending transactions on the same EDI LSOR version as AT&T's.

AT&T's argument that it would not be workable for AT&T or Covad to submit both the voice and data portions of the order has been rejected by the MPSC.[33] Any business seeking to partner with another business to provide line splitting arrangements can – and should – build interfaces and processes to share the information necessary to accomplish a task such as

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[29] *See* AT&T's March 19 Ex Parte at 4.

[30] Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, Sixth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, 16 FCC Rcd 2101, ¶ 20 (2001) ("*Line Sharing Reconsideration Order*").

[31] AT&T's contention that LEX is a "web-based interface and cannot support commercial volumes" (DeYoung/Connelly Supp. Decl. ¶ 31) is unsupported, and is directly contradicted by the evidence on file in this proceeding. *See* Revised Attachment D to the Affidavit of Mark J. Caldwell, attached to Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Feb. 4, 2003).

[32] *See* Cottrell/Lawson Joint Reply Aff. ¶ 64.

[33] *See* DeYoung/Connelly Supp. Decl. ¶ 31.

this. The MPSC recently rejected the suggestion that "[SBC] should be the central repository of information and communication between the voice CLEC and the data CLEC." Opinion and Order, MPSC Case No. U-12320, at 24 (October 3, 2002). Rather, the MPSC explained that "[SBC] need not take on the role of mediator between two CLECs," because "CLECs that share a loop to deliver two types of service *must coordinate their respective activities with each other* to minimize the probability of disruption to their common customer." *Id.* (emphasis added). As the MPSC has recognized, it is only reasonable to assume that a close relationship will exist between CLECs in a partnering arrangement. Sharing the information necessary to place orders therefore is both feasible and practical.

Rather than adopting one of the reasonable solutions to this issue suggested by SBC (all of which require some effort by either AT&T or its business partner), AT&T seeks instead to place the entire burden of new approaches on SBC. However, as this Commission has consistently held, such new policy issues are not appropriately resolved in Section 271 applications. *See, e.g., Georgia/Louisiana Order* ¶ 115 ("As we have stated in other section 271 orders, new interpretative disputes concerning the precise content of an incumbent LEC's obligations to its competitors, disputes that our rules have not yet addressed and that do not involve per se violations of the Act or our rules, are not appropriately dealt with in the context of a section 271 proceeding."); *Texas Order* ¶ 27 ("Nothing in section 271 or any other provision of the Act compels us to require a BOC applicant to demonstrate compliance with new local competition obligations that were unrecognized at the time the application was filed.").

AT&T's discrimination claim here is as equally misplaced as its discrimination claim discussed above regarding Michigan Bell's "re-use" policy. In both cases AT&T compares "apples to oranges." As shown above, there are fundamental differences between line sharing and line splitting. Moreover, there is nothing discriminatory about Michigan Bell's single "carrier of record" requirement for any given network element, which applies equally to all carriers. AT&T can order loops for line splitting, as can Covad, and in that regard there is no difference between AADS, Michigan Bell's advanced services affiliate, AT&T and /or Covad. Each carrier can interact one-on-one with SBC's ordering systems. AT&T's discrimination argument is off the mark because it creates a false comparison. This Commission has long recognized the inherent differences and complexities that arise between a two-carrier interaction (SBC - CLEC (whether ASI, AT&T or Covad)) and a three-carrier interaction (SBC- CLEC - CLEC).

Finally, AT&T argues that SBC has failed to consider AT&T's proposal for versioning based on TPID. Initially it is important to clarify that SBC and AT&T are not talking past each other on this issue. It simply is not true that SBC has failed to consider AT&T's proposal for versioning based on TPID. Through the Change Management Process, CLECs requested changes to SBC's versioning that would enable them to send transactions on more than one LSOR version. In response to those requests, SBC and CLECs discussed several approaches to versioning – including TPID and PON level versioning – in Change Management Process Meetings.[34] Specifically, on September 12-13, 2002, SBC held a CMP

[34] *See, e.g.*, Minutes from the CMP Meeting (July 11, 2002), attached to Accessible Letter CLECALL02-098 (App. I, Tab 14). A number of SBC subject matter experts attended this CMP Meeting for the purpose of "fact-

meeting for the express purpose of discussing versioning alternatives with the CLEC community, including TPID and PON alternatives.[35] On September 19, 2002, based on discussion at the September 12-13 meeting, SBC provided CLECs with three versioning scenarios for additional discussion, all based on PON identification.[36] These three scenarios were then discussed on another conference call held on September 26, 2003.[37] Until now, however, there has been no complaint that those scenarios did not include a TPID proposal. CMP discussions regarding changes to versioning were tabled when the parties were unable to reach consensus regarding SBC's request for simplification of the versioning environment in return for its agreement to implement the changes requested by the CLECs. (Cottrell/Lawson Reply Aff. ¶ 66). Further discussion of this issue is on the agenda for the CMP meeting scheduled for April 3, 2003.

In its March 19 Ex Parte, AT&T has now asked for SBC to provide a comparison of the costs involved in adopting a versioning based on PON versus one based on TPID.[38] Based on SBC's high-level estimates, these two options, while involving substantially different programming efforts by SBC, would require a similar investment of time, effort and resources. SBC estimates that TPID versioning would require an estimated 10,000 hours for SBC's Information Technology (IT) organization to plan the necessary changes and then to alter and deploy the software code.[39] Specific IT activity would include the following:

- *Reference Tables*: There are more than 40 tables that utilize Company Code ("CC") as a data element for validation purposes. Each table would need to be analyzed for the additional relationship impacts associated with TPID. Some of these tables are feeds from other SBC systems, which would also require an analysis of the data feeds. SBC anticipates that table data would need to change, and requirements for the version-to-TPID and TPID-to-CC relationship would need to be developed.

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finding" concerning versioning implementation. At that meeting, several versioning options (including the ability to version by OCN, by TPID, by REQTYP, and by combinations of these identifiers) were raised for additional discussion by the CLECs.

[35] When CLECs specifically raised versioning based on TPID, SBC advised that it would be willing to implement Verizon's versioning model (which uses TPID identification) throughout SBC's 13-state region. *Not a single CLEC supported that alternative*. Indeed, several CLECs specifically indicated that they did *not* want the Verizon versioning process. Thus, although AT&T suggests that Verizon's versioning model is somehow superior to SBC's (*see, e.g.*, DeYoung/Connolly Supp. Decl. ¶ 30 n.11), the CLECs participating in SBC's 13-state CMP do not, apparently, share this view. Given that SBC has offered to implement versioning "as other RBOCs have done," March 19, 2003 Ex Parte at 3, and given that this alternative was squarely rejected by AT&T and other CLECs, AT&T should not be heard to complain to the FCC that SBC's versioning model isn't the same "as other RBOCs." RBOC versioning policies clearly do not need to be identical in order to satisfy the requirements of the Act.

[36] *See* Accessible Letter CLECALLS02-111 (September 19, 2002) (App. K, Tab 16).

[37] AT&T representatives attended all of these CMP meetings, as well as the July CMP meeting referenced in fn. 1 above.

[38] *See* DeYoung/Connolly Supp. Decl. ¶ 32

[39] SBC's high-level estimate for TPID versioning assumes that all versions of a particular PON would be sent using the same TPID, and that notifications (FOC, SOC, reject, etc.) for a particular PON would be returned using the same LSOR version on which the PON was sent.

- *Validation Business Logic*: All modules that utilize the reference tables identified above will need to be modified. The corresponding business logic will also need to be modified and is estimated to impact 50 percent of all documentation and modules.

- *Conversions*: Implementing a new strategy could require SBC to convert existing PONs "in the pipeline" from an earlier version to the version selected by the CLEC for the TPID. Database conversions are significant from a requirements and execution standpoint. They can be, however, difficult to quantify given that SBC does not know the detailed data that is based upon CLEC implementations.

- *Notifications*: LASR would need to redesign the loss notification process to translate a CC to a valid TPID. Since SBC's service order and billing systems do not utilize TPID, SBC would need a translation table to correlate CC to TPID. The CLEC will need to provide a default TPID and LSOR version to receive loss notifications through a newly defined process.

- *LSC Workload GUI*: Search criteria and screen displays will need to be altered to allow the LSC representatives to view the TPID on their screens and reports. These changes would affect more than 30 modules and 90% of the LASR GUI business logic.

Approximately 10,000 additional hours would be required to develop the requirements for the change, implement the modified documents, and effectively retrain and communicate the changes to internal SBC personnel.

If these, or any other versioning changes, were to be implemented, work would need to be prioritized based on SBC's already-standing CMP commitments. At a minimum, SBC estimates that a change of this type to its versioning scheme would take 9-12 months to develop and implement from the time SBC begins to work on the project. Any commencement of work by SBC on such a project would be dependent on the prioritization and completion of already scheduled work.

As should be clear from the discussion, SBC's versioning imposes no obstacles to competition and currently meets what is required for 271 approval. SBC should not have to alter its versioning to achieve 271 or for any other reason. Any change that SBC does undertake should be negotiated with all CLECs on a business-to-business basis.

4. BearingPoint Testing. Contrary to AT&T's assertions,[40] BearingPoint did perform sufficient testing of Michigan Bell's processes to provide a reliable indication of Michigan Bell's capability to process line splitting orders.

Indeed, as a result of a change request submitted by AT&T, the MPSC staff required the modification of the Michigan OSS Evaluation Master Test Plan on May 23, 2001[41] to include

[40] DeYoung/Connolly Supp. Decl. ¶¶ 34-37.

line sharing and line splitting scenarios. BearingPoint reported the results of its testing of these line splitting scenarios in its draft report on September 23, 2002, and in its final report on October 30, 2002.[42] As explained in paragraphs 15-18 of the Chapman/Cottrell Reply Affidavit, BearingPoint's results for specific test points demonstrate that they conducted extensive testing of line splitting ordering and provisioning scenarios, and of the individual elements used in line splitting. Further, it is Michigan Bell's understanding that, while not specifically referenced in the BearingPoint Test Report(s), in fact BearingPoint also tested the xDSL loop to line splitting and retail voice service to line splitting scenarios.

AT&T's only complaint is that BearingPoint did not specifically test the single LSR process for converting UNE-P to line splitting that was implemented on August 3, 2002, after the BearingPoint testing was substantially complete. As indicated in the Chapman/Cottrell Reply Affidavit, however, this process enhancement merely simplified the ordering process: Rather than submitting 3 separate LSRs to accomplish this conversion, CLECs may now submit a single LSR. Under this single LSR process, once the single LSR is received by the wholesale service ordering gateway, it is necessarily converted to the same three internal service orders that previously would have resulted from three separate LSRs submitted by the CLEC. From that point, the orders are treated by Michigan Bell's ordering, provisioning, and billing systems, and technicians, in the same manner regardless of whether they are individual, related LSRs or, instead, are the single consolidated LSR for this particular ordering scenario. (In fact, CLECs may continue using related LSRs to effect a UNE-P to line splitting migration, if they choose to do so.) Consequently, the fact that the "single LSR" process for ordering the migration of an existing UNE-P customer to line splitting was not implemented until August 2002 would not and did not prevent BearingPoint from testing Michigan Bell's line splitting capabilities.

AT&T provides a list of BearingPoint tests which, AT&T claims, were not conducted with respect to the conversion of UNE-P to line splitting.[43] This is not correct. While the tests cited by AT&T did not specifically involve the *single LSR process* for UNE-P to line splitting (because, again, it was not rolled out until August 3, 2002), BearingPoint did, as stated in Chapman/Cottrell Reply Affidavit, individually test the LSRs a CLEC would need to submit to convert from UNE-P to line splitting. Furthermore, although BearingPoint's report does not identify the specific products/scenario associated with the test points cited by AT&T,[44] the report and other publicly available test documentation provide evidence that

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[41] Letter from Thomas R. Lonergan, Director, Communications Division, MPSC, to Michigan Collaborative Group Members, May 23, 2001 (attached as Exhibit 5).

[42] *See* KPMG Draft OSS Evaluation Project Report, at 186-187, Table 4-4 (Sept. 23, 2002) (App. C, Tab 102); *see also* BearingPoint OSS Evaluation Project Report, at 192-193, Table 4-4 (Oct. 30, 2002) (App. C, Tab 114) ("BearingPoint October 30, 2002 Report").

[43] DeYoung/Connolly Supp. Decl. ¶ 36.

[44] While it is not possible without BearingPoint's assistance to reconstruct the exact representation of line splitting transactions within the results for the following test points, it is also not possible to conclude, as AT&T suggests, that line splitting orders were not included. In fact, other evidence beyond the explicit test point results in the BearingPoint October 30, 2002 OSS Evaluation Project Report support the conclusion that line splitting orders were included.

BearingPoint included line splitting transactions within its results for many other test points, including the following test points cited by AT&T:

- TVV1-2 "SBC Ameritech order documentation used during the course of the evaluation was clear, accurate, and complete."
- TVV1-4 "SBC Ameritech provides required order functionality."
- TVV1-22 "SBC Ameritech systems provide timely Mechanized Reject Messages in response to electronically submitted orders."
- TVV1-23 "SBC Ameritech systems provide timely Non-Mechanized Reject Messages in response to electronically submitted orders."
- TVV1-28 "SBC Ameritech provides timely Completion Notices."
- TVV1-30 "SBC Ameritech provides clear, accurate, and complete Firm Order Confirmations (FOC)."[45]
- TVV1-31 "SBC Ameritech provides clear, accurate, and complete Reject Messages."[46]

With respect to the other tests cited by AT&T, Michigan Bell has no specific knowledge as to whether or not they involved line splitting scenarios. However, they certainly could have involved line splitting scenarios and, in any event, they are the types of tests results that are virtually unaffected by the product and/or ordering scenario tested, and therefore provide valuable insight into the reliability of Michigan Bell's OSS. For example, BearingPoint's results on a test of SBC's Local Service Center speed-of-answer is relevant regardless of the specific type of LSR, and the specific underlying scenario, tested. Other tests cited by AT&T that fall into this category are:

- TVV1-32 "SBC Ameritech provides clear, accurate, and complete Jeopardy Notifications."
- TVV1-21 "SBC Ameritech systems provide timely Functional Acknowledgments (FA)."
- TVV1-33 "SBC Ameritech LSC Service Representatives answer help desk calls in a timely manner"

[45] BearingPoint examined "a representative sample of 215 FOCs throughout the course of the Pre-Order and Order Functional Testing." BearingPoint October 30, 2002 Report, at 797.

[46] BearingPoint examined "a representative sample of 190 Reject Messages for clarity, accuracy and completeness." *Id.*

In sum, BearingPoint performed significant end-to-end testing of the ordering and provisioning of line splitting elements within multiple order scenarios, including multiple line splitting scenarios. The validity of this testing is in no way reduced by the post-test implementation of an enhancement to the ordering process used in *one* line splitting ordering scenario.

2. With regard to SBC's response to Question No. 5 in the March 17 Ex Parte, why will SBC not agree to e-mail erroneous completion notifications to the CLEC as WorldCom requests? Also, why will SBC not agree to e-mail CLECs WSC notifications as requested by WorldCom?

WorldCom's comments have confused two separate issues. First, SBC does provide erroneous completion notifications via e-mail. See Brown Reply Aff. ¶ 17 ("The SBC Account Team representative then e-mails the spreadsheet to the affected CLEC") (Reply App., Tab 2); see also Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 17, 2003) ("March 17 Ex Parte"), Attach. A at 8 ("SBC provides the CLEC with notification via e-mail"). WorldCom admits, in fact, that it receives erroneous completion notifications by e-mail. See WorldCom's Lichtenberg Reply Decl. ¶ 27 ("SBC again transmitted the spreadsheet via e-mail").

Rather than receiving erroneous completion notifications via e-mail, WorldCom would apparently prefer that SBC provide it with an electronic line loss notification (LLN). As discussed in response to Question No. 5 in the March 17 Ex Parte, because there is no actual line loss in the case of an erroneous completion notice, there is no way for SBC to provide WorldCom with an electronic LLN under these circumstances. See March 17 Ex Parte, Attach. A, at 8; see also Brown Reply Aff. ¶ 18.

Second, WorldCom has asked SBC to implement an e-mail process for WSC notifications pending implementation of the mechanized WSC jeopardy notice, scheduled for September of this year. See WorldCom's Lichtenberg Decl. ¶ 15. During the March 19, 2003 CLEC User Forum ("CUF") meeting, SBC Midwest committed to develop and implement an e-mail process for WSC notifications prior to the next scheduled CUF meeting on April 2, 2003. The details of the new e-mail process will be provided to CLECs via Accessible Letter prior to that meeting.

3. The answer to Question No. 9 in SBC's March 17 Ex Parte did not explain the definition of "project" that was ultimately settled on in the collaboratives. What was that definition?

A "project" is the number of lines, circuits, and/or telephone numbers which exceed a threshold that must be "project managed" outside of the normal ordering and provisioning process. The definition of what a "project" is for purposes of the exclusions in the ordering PMs 5, 6, 9, 10 and 11 varies depending upon the specific product type that is ordered by the CLECs. In the PM collaboratives referred to in the answer to Question #9 in Attachment

A of SBC's March 17, 2003 Ex Parte, the parties agreed that the definition of what a "project" is within these PMs can be either of the following two possibilities:

1) Service requests that are defined as "projects" in CLEC OnLine referenced at:

https://clec.sbc.com/clec/hb/files/amer/Ameritech%20RESALE%20Standard%20Due%20Dates.xls.

https://clec.sbc.com/clec/hb/files/amer/Ameritech%20UNE%20Standard%20Due%20Dates.xls;[47] or

2) As mutually agreed upon by the CLEC and SBC Midwest.

[47] This URL address can change from time to time. The steps for accessing the information described above are as follows: 1) Go to CLEC OnLine, 2) Select CLEC Handbook, 3) Choose an Ameritech State, 4) Select Ordering, 5) Select Due Date Matrix, 6) Select Resale matrix or UNE matrix.

Exhibit 1

FENNELL, KELLY A (AIT)

From: Reidy,John J,III (Jay) - LGCRP [jjreidy@att.com]

Sent: Thursday, February 13, 2003 5:24 PM

To: Schneidewind, Ann R (CIS); Al Ernst (E-mail); Alan Kirk (E-mail); Andrew Isar (E-mail); Anne LaLena (E-mail); Bill DeFrance (E-mail); Bion Ostrander (E-mail); Bret Seely (E-mail); Brett Leopold (E-mail); Bruce Bennett (E-mail); Glover,Candice L - LGCRP; Hegstrom,Cate D - LGCRP; Chad Sharp (E-mail); ANDERSON, CRAIG (Legal); David Marvin (E-mail); Dayna Moss (E-mail); Pearl,Denise A - LGCRP; NAVICKAS, DONNA (SBC-MSI); Doug Kinkoph (E-mail); Trabaris,Douglas W (Doug) - LGCRP; Brown,Frances E (Francie) - LGCRP; Francie McComb (E-mail); Gary Field (E-mail); Greg Boyd (E-mail); Haran Rashes (E-mail); Harvey Hollins (E-mail); Harvey Messing (E-mail); Howard Siegel (E-mail); Jack Dempsey (E-mail); Jane Van Duzer (E-mail); Jeff Santry (E-mail); Jerry Finefrock (E-mail); Jim Denniston (E-mail); Gomoll,John - LGCRP; John Kern (E-mail); LENAHAN, JOHN (Legal); Karen Coleman (E-mail); Karen Kinard (E-mail); Moore,Karen W - CSLSM; Kathleen O'Reilly (E-mail); FENNELL, KELLY A (AIT); BERGREN, KENT I (SBC-MSI); BRANNOCK, KIRK R (AIT); Leland Rosier (E-mail); Leonard Wolfe (E-mail); Lynn Shecter (E-mail); COTTRELL, MARK (SBC-MSI); Mark Iannuzzi (E-mail); Melia Carter (E-mail); Michael Reith (E-mail); Michelle Vocht (E-mail); Mike Ashton (E-mail); Mike Batts (E-mail); Isiogu, Orjiakor; Paul Rebey (E-mail); Peter Healy (E-mail); Webber,Rebecca L - CSLSM; Rick Coy (E-mail); Rick Gould (E-mail); POULTON, RICHARD A (SBC-MSI); GLEASON, ROBIN M (AIT); Robin McVeigh (E-mail); Ron Walters (E-mail); Sharon Thomas (E-mail); Sherry Lichtenberg (E-mail); Stephanie Kurlan (E-mail); Sue Platner (E-mail); FRENTZ, SUSAN (AIT); Theresa Powell (E-mail); Thomas Maier (E-mail); Tim Connolly (E-mail); Tim Gilles (E-mail); HUDZIK, JOHN (SBC-MSI); Bill Haas (E-mail)

Cc: Lonergan, Thomas R (CIS)

Subject: RE: March 4 & 5th Collaboratives

Ann,

In response to your email and its request "to identify line sharing/line splitting scenarios by February 13, 2003," it is our understanding that the the collaborative will not be discussing the four scenarios upon which the Commission has now made findings, and AT&T/TCG Detroit do not have new scenarios to identify presently. To the extent that SBC Michigan fails to comply with its line sharing/line splitting/HFPL obligations under applicable law, AT&T will seek appropriate redress for such failures.

Jay Reidy/AT&T

-----Original Message-----
From: Schneidewind, Ann R (CIS) [mailto:arschne@michigan.gov]
Sent: Tuesday, February 11, 2003 4:19 PM
To: Al Ernst (E-mail); Alan Kirk (E-mail); Andrew Isar (E-mail); Anne LaLena (E-mail); Bill DeFrance (E-mail); Bion Ostrander (E-mail); Bret Seely (E-mail); Brett Leopold (E-mail); Bruce Bennett (E-mail); Glover,Candice L - LGCRP; Hegstrom,Cate D - LGCRP; Chad Sharp (E-mail); Craig Anderson (E-mail); David Marvin (E-mail); Dayna Moss (E-mail); Pearl,Denise A - LGCRP; Donna Navickas (E-mail); Doug Kinkoph (E-mail); Trabaris,Douglas W (Doug) - LGCRP; Brown,Frances E (Francie) - LGCRP; Francie McComb (E-mail); Gary Field (E-mail); Greg Boyd (E-mail); Haran Rashes (E-mail); Harvey Hollins (E-mail); Harvey Messing (E-mail); Howard Siegel (E-mail); Jack Dempsey (E-mail); Jane Van Duzer (E-mail); Reidy,John J,III (Jay) - LGCRP; Jeff Santry (E-mail); Jerry Finefrock (E-mail); Jim Denniston (E-mail); Gomoll,John - LGCRP; John Kern (E-mail); John Lenahan (E-mail); Karen Coleman (E-mail); Karen Kinard (E-mail); Moore,Karen W - CSLSM; Kathleen O'Reilly (E-mail); Kelly Fennell (E-mail); Kent Bergren (E-mail); Kirk Brannock (E-mail); Leland Rosier (E-mail); Leonard Wolfe (E-mail); Lynn Shecter (E-mail); Mark Cottrell (E-mail); Mark Iannuzzi (E-mail); Melia Carter (E-mail); Michael Reith (E-mail); Michelle Vocht (E-mail); Mike Ashton (E-mail); Mike Batts (E-mail); Isiogu, Orjiakor; Paul Rebey (E-mail); Peter Healy (E-mail); Webber,Rebecca L - CSLSM; Rick Coy (E-mail); Rick Gould (E-mail); Rick Poulton (E-mail); Robin Gleason (E-mail); Robin McVeigh (E-mail); Ron Walters (E-mail); Sharon Thomas (E-mail); Sherry Lichtenberg (E-mail); Stephanie Kurlan (E-mail); Sue Platner (E-mail); Susan Frentz (E-mail); Theresa Powell (E-mail); Thomas Maier (E-mail); Tim Connolly (E-mail); Tim Gilles (E-mail); John Hudzik (E-mail); Bill Haas (E-mail)
Cc: Lonergan, Thomas R (CIS)
Subject: RE: March 4 & 5th Collaboratives

All,

Please add Bill Haas from McLeod to the distribution list for this collaborative. His email is whaas@mcleodusa.com. Thanks.

Ann Schneidewind

-----Original Message-----
From: Schneidewind, Ann R (CIS)
Sent: Tuesday, February 11, 2003 2:55 PM
To: Al Ernst (E-mail); Alan Kirk (E-mail); Andrew Isar (E-mail); Anne LaLena (E-mail); Bill DeFrance (E-mail); Bion Ostrander (E-mail); Bret Seely (E-mail); Brett Leopold (E-mail); Bruce Bennett (E-mail); Candice Glover (E-mail); Cate Hegstrom (E-mail); Chad Sharp (E-mail); Craig Anderson (E-mail); David Marvin (E-mail); Dayna Moss (E-mail); Denise Pearl (E-mail); Donna Navickas (E-mail); Doug Kinkoph (E-mail); Doug Trabaris (E-mail); Francie Brown (E-mail); Francie McComb (E-mail); Gary Field (E-mail); Greg Boyd (E-mail); Haran Rashes (E-mail); Harvey Hollins (E-mail); Harvey Messing (E-mail); Howard Siegel (E-mail); Jack Dempsey (E-mail); Jane Van Duzer (E-mail); Jay Reidy (E-mail); Jeff Santry (E-mail); Jerry Finefrock (E-mail); Jim Denniston (E-mail); John Gomoll (E-mail); John Kern (E-mail); John Lenahan (E-mail); Karen Coleman (E-mail); Karen Kinard (E-mail); Karen Moore (E-mail); Kathleen O'Reilly (E-mail); Kelly Fennell (E-mail); Kent Bergren (E-mail); Kirk Brannock (E-mail); Leland Rosier (E-mail); Leonard Wolfe (E-mail); Lynn Shecter (E-mail); Mark Cottrell (E-mail); Mark Iannuzzi (E-mail); Melia Carter (E-mail); Michael Reith (E-mail); Michelle Vocht (E-mail); Mike Ashton (E-mail); Mike Batts (E-mail); Isiogu, Orjiakor; Paul Rebey (E-mail); Peter Healy (E-mail); Rebecca Vanderpol (E-mail); Rick Coy (E-mail); Rick Gould (E-mail); Rick Poulton (E-mail); Robin Gleason (E-mail); Robin McVeigh (E-mail); Ron Walters (E-mail); Sharon Thomas (E-mail); Sherry Lichtenberg (E-mail); Stephanie Kurlan (E-mail); Sue Platner (E-mail); Susan Frentz (E-mail); Theresa Powell (E-mail); Thomas Maier (E-mail); Tim Connolly (E-mail); Tim Gilles (E-mail); John Hudzik (E-mail)
Cc: Lonergan, Thomas R (CIS)
Subject: March 4 & 5th Collaboratives

All,

As you will recall, when the Michigan Commission issued its report on 271 issues on January 13, 2003, it also issued an accompanying order specifying a number of areas where further discussions, improvement and compliance plans would be required. The topics to be addressed include pre-order timeliness, line loss notifiers, customer service records, directory listing database, trouble report closure coding, billing auditability, change management procedures and line sharing/line splitting scenarios. SBC must submit the compliance and improvement plans required by that order by February 13, 2003. CLECs have been requested to identify line sharing/line splitting scenarios by February 13, 2003 as well. Collaborative discussions on these topics will be held beginning at 9:00 a.m. on March 4, 2003 and also on March 5th if needed in the Commission's offices. A phone bridge will be available for those who are unable to attend in person. The information regarding that bridge is as follows:

Call-In: 800-215-4958

Passcode: 342-1153#

I request that all improvement and compliance plans as well as line sharing/line splitting scenarios be emailed to this distribution list for the review of interested parties. Please let me know if there are any questions.

Ann R. Schneidewind
Michigan Public Service Commission Staff
(517) 241-6211

Exhibit 2

Additional Line Splitting / Line Sharing Scenarios
Per MPSC January 13, 2003 Order in U-12320

Introduction

Pursuant to the Michigan Public Service Commission's ("MPSC's") January 13, 2003 Order (January 13 Order), the collaborative is to reconvene to address additional line splitting / line sharing scenarios as raised by the competitive local exchange carriers ("CLECs"). CLECs were to submit any issues they wanted discussed by February 13, 2003. WorldCom was the only CLEC to submit any issues and it raised seven issues to be addressed in the collaborative.[1]

SBC Michigan has addressed below the scenarios and issues raised by WorldCom. SBC's response with respect to Worldcom's issues are consistent with the MPSC's October 3, 2002 Order on this subject and SBC's Amended Compliance Plan which was previously filed with and approved by the MPSC.[2]

In responding to each of Worldcom's issues, SBC Michigan has generally applied (as applicable) the following principles previously approved by the MPSC:

- The end user is the driver and will be the key component in determining what ordering path is taken.
- The end user will be informed of any impact on his/her current services that he/she has not expressly elected to change, so that he/she can make a well-informed decision.
- In a line splitting arrangement, the voice CLEC ("V-CLEC") and data CLEC ("DLEC") will institute any arrangements they deem necessary to assure that their common end user experiences a minimum disruption in service.

[1] All of WorldCom's issues are addressed below, except for part of Issue #4. Part of WorldCom Issue #4 is the scenario "UNE-P to Line Splitting" and has already been addressed; see Scenario #4 of the 12/11/02 SBC Amended Compliance Plan. Additionally, Issue #7 will be addressed throughout.

[2] In submitting this response to WorldCom's issues/scenarios, SBC Michigan does not waive any of its legal rights but instead, expressly reserves all of its rights, remedies and arguments with respect to any decisions, proceedings or remands thereof which affects any of the scenarios or issues addressed herein, including but not limited to with respect to its current appeal of the MPSC's October 13, 2002 Order, the D.C. Circuit's decision in *United States Telecom Association, et. al v. FCC*, 290 F.3d 415 (D.C. Cir. 2002)("USTA Decision") and the FCC's Triennial Review Order, adopted by the FCC on February 20, 2003, on remand from the USTA Decision and pursuant to its Notice of Proposed Rulemaking, *Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, FCC 01-361 (rel. Dec. 20, 2001).

Scenario #5: Line Sharing to Line Splitting – Change in Splitter[3]

Definition: End user currently obtains voice service from SBC Michigan and data service from a DLEC[4], and seeks to change both its voice and data provider.[5]

A related three-order process will be used to effectuate this scenario; this is similar to those used for Scenarios No.1 and 3 previously addressed in SBC Michigan's Amended Compliance Plan. However, under this scenario, the HFPL will be disconnected and the physical loop and port will be re-used to provide the requested unbundled network elements ("UNEs"); that is, the unbundled xDSL-capable loop and ULS-ST port. The cross-connects currently in place will need to be removed, with new cross-connects installed to take those UNEs to either the new DLEC's or V-CLEC's collocation arrangement. The three local service requests ("LSRs") will be submitted with the RPON field populated to relate the orders. The SBC technician will work the orders together in order to minimize downtime. CLECs that provide their own splitters for line splitting arrangements should have the splitter pre-wired before SBC Michigan performs its work. As a result, when SBC Michigan terminates the unbundled DSL capable loop and the unbundled switch port to the new DLEC's or V-CLEC's designated location at the collocation arrangement, connectivity will be achieved. End users might notice a brief disruption of service similar to that experienced when the HFPL was initially provisioned by SBC Michigan to the DLEC.

The LSRs that will be submitted are:

- √ Disconnect HFPL, as SBC is no longer the retail voice provider.
- √ Install standalone xDSL-capable Loop; re-use existing loop.
- √ Install ULS-ST line port; re-use existing port and telephone number

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3 This scenario addresses WorldCom Issue #1.

4 As the MPSC found in its October 3, 2002 Order, whether the DLEC is affiliated or not with SBC is irrelevant in the processes followed under each of the scenarios. Thus, the scenarios contained herein will address DLECs generally.

5 This assumption is made for the following reasons: 1) it would not be logical for a DLEC to have splitters in place in its collocation area and to also be using SBC splitters simultaneously; and 2) the scenario where there is no change in splitter is covered in Scenarios No. 1 and 3 which were addressed in SBC Michigan's December 11, 2002 Amended Compliance Plan.

The following summarizes the rates that will be applied: [6]

Orders	Non-Recurring	Recurring
1. Current DLEC for HFPL disconnection.		
• Disconnect HFPL		N/A
– Service Order	$1.54	
– Disconnection	$10.00	
	$11.54	
2. V-CLEC/DLEC for loop/port installation		
• Order xDSL-capable Loop		$10.26
– Service Order	$3.16	
– Connection	$17.82	
– Cross Connect		$0.13
• Order ULS-ST Port		$2.53
– Service Order	$3.02	
– Installation	N/A	
– Cross-Connect		$0.13
	$24.00	$13.05
Assumptions: • Example uses Access Area A.		

CLECs that share a loop to simultaneously deliver voice and data service must coordinate their respective activities with each other to minimize the probability of disruption to their common end user customer. SBC Michigan will provide CLECs the necessary unbundled network elements and maintain those elements as needed.

[6] Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement shall control.

Scenario #6: Line Splitting to Line Sharing[7]

Definition: End user currently obtains voice service from V-CLEC and data service from a DLEC, and wishes to return to SBC Michigan for its voice service (and the data becomes line sharing).

This scenario cannot exist. SBC Michigan is only obligated to offer (and only offers today) line sharing on a loop over which SBC Michigan is currently providing retail voice service.

If the end user wishes to return to SBC Michigan for voice service, SBC Michigan provisions that service over a new, voice grade loop.

Scenario #7: Line Splitting to Line Splitting[8]

Definition: End user currently obtains voice and data service from CLEC(s) and wishes to change its voice and/or data service.

WorldCom raises an issue related to the use and/or content of a customer service record ("CSR") when the end user is currently obtaining service via a line splitting arrangement.

In this situation, SBC Michigan may not have a customer service record ("CSR") for the end user. In a current line splitting situation, the V-CLEC may use its own switch to provide the voice service or may lease a ULS-ST port from SBC Michigan.[9]

In the situation where the current V-CLEC uses its own switch to provide voice service to the end user, SBC Michigan would have no CSR on that end user. Since the end user is being served by the current V-CLEC's switch, only that V-CLEC would have the CSR for the end user. Thus, the winning CLEC would have to contact the then current V-CLEC to obtain a CSR, or the winning CLEC could solicit information needed directly from the end user.

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7 This scenario addresses WorldCom Issue #3.

8 This scenario addresses WorldCom Issue #2 and part of Issue #4.

9 In its submission, WorldCom complains that SBC Michigan, in its Amended Compliance Plan, does not "disclose" that the CSR would not be available in situations where another voice CLEC is currently providing service to the end user. While this is true, SBC Michigan notes that it provided an example CSR (as was available) for the scenarios being addressed – where the end user was currently obtaining its voice service from SBC Michigan. As noted below, there are circumstances where SBC Michigan does not have a CSR for the end user or does not have information on how a UNE is being used by the current serving CLEC.

In the situation where the current V-CLEC leases a ULS-ST port from SBC Michigan to provide voice service to the end user, SBC Michigan would have a CSR indicating that the ULS-ST port was being provisioned to that V-CLEC. However, SBC Michigan would not have information stored on the CSR as to how the ULS-ST port was being used by the V-CLEC. For example, SBC would not have any specific information contained in its records indicating whether or not the current V-CLEC was using the ULS-ST port in a line splitting scenario. Again, the winning CLEC would have to contact the then current V-CLEC to obtain the information it seeks, or the winning CLEC could solicit information needed directly from the end user.

As the MPSC found in its October 3, 2002 Order, SBC Michigan is not required to be the "mediator between CLECs when permitting line-splitting arrangements."[10]

As there are multiple sub-scenarios related to the "line splitting to line splitting" scenario, SBC Michigan believes that further discussion and prioritization is needed as to such arrangements. Specifically, SBC Michigan believes that UNE installation, UNE move, and/or CLEC-to-CLEC UNE migration orders would apply in varying combinations, depending on which CLEC may be changing in the migration as well as how each V-CLECs provides voice service to its end users.

WorldCom Issue #4 (in part) raises the sub-scenario where the V-CLEC remains the same, but the DLEC changes. Per WorldCom's statement in this sub-scenario, the V-CLEC is using a ULS-ST port to provide the voice service to the end user. Assuming that the V-CLEC is the customer of record for the involved UNEs and it was utilizing the splitter and collocation of the former DLEC and will use the splitter and collocation of the new DLEC, the V-CLEC would submit LSRs to "move" the UNEs to the new DLEC's collocation. That is, the current cross-connects for each of the two UNEs would be removed, and new cross-connects would be installed.

[10] MPSC October 3, 2002 Order at p. 19.

The following summarizes the rates that will be applied:[11]

Orders	Non-Recurring	Recurring
1. V-CLEC • Order Move of Loop and Port		
– Loop		$10.26
– Service Order	$3.16	
– Connection	$17.82	
– Cross-Connect		$0.13
– Port		$2.53
– Service Order	$3.02	
– Connection	N/A	
– Cross Connect	$24.00	$0.13 $13.05
Assumptions: • Example uses Access Area A.		

[11] Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement shall control.

Scenario #8: Line Splitting to UNE-P[12]

Definition: End user currently obtains voice service from a V-CLEC and data service from a DLEC, and the data service is to be disconnected (either at the request of the data provider or the end user). Additionally, this scenario could apply if the voice provider and data provider no longer agreed to their line splitting arrangements.

Two sub-scenarios may apply here, depending on the actions taken by the V-CLEC and/or DLEC.

Scenario #8a: DLEC discontinues data service

Under this scenario, at the request of the DLEC or the end user, the CLEC with the established collocation arrangement involved in the line splitting arrangement (where the CLEC-provided splitter is collocated) could simply perform an operation to eliminate the data service from the circuit. In particular, such CLEC could:

- Disconnect the cross connect from the splitter to the DSLAM,[13] effectively disconnecting the data service; or
- Disconnect the loop's cross connect into the splitter and, instead, connect it with the appearance of the switch port.

No rates would be assessed by SBC Michigan for either of the actions referenced above.

Scenario #8b: V-CLEC and DLEC no longer have a line splitting arrangement.

This scenario could occur for various reasons e.g., the end user elects to obtain a data service that is not compatible with the V-CLEC's analog voice service (i.e., it cannot be provisioned on a line-split loop); and, the two CLECs involved in the line splitting arrangement cease to agree on those line splitting arrangements; or the two CLECs elect to terminate their line splitting arrangement.

In any event, under this scenario, the V-CLEC will need to request an 8db (voice-grade) loop to provide voice service. Thus, it will order a new UNE-P (specifying the re-use of the SBC Michigan ULS-ST port currently being utilized in such arrangement). In this instance, the new UNE-P would be provisioned with a loop suitable for voice service (i.e., an 8db loop).[14] This is the same

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12 This scenario addresses WorldCom Issue #5.

13 DSLAM is defined as a Digital Subscriber Line Access Multiplexor.

14 As is generally known, a loop that has been conditioned to be xDSL-capable, often has "inhibitors" removed from the loop that were put in place to improve/enhance voice service. Thus, when solely

procedure that is used when end users return to SBC Michigan from a line splitting arrangement; a new loop will be assigned to ensure that the characteristics of the loop are suitable for providing quality voice service. The current process for this scenario can be found on CLEC OnLine, under the CLEC Handbook for "CPO".

The following summarizes the rates that will be applied:[15]

Orders	Non-Recurring	Recurring
1. Voice CLEC		
• Order New UNE-P with reuse of ULS-ST Port and TN		
– Loop		$8.47
– Service Order	$3.16	
– Connection	$17.82	
– Port		$2.53
– Service Order	N/A	
– Connection	N/A	
– Cross Connect	$0.13	$0.13
	$20.98	$11.13
Assumptions: • Example uses Access Area A.		

If/when the DLEC elects to disconnect the existing xDSL capable loop, the following charges would apply:[15]

Orders	Non-Recurring
• Disconnect xDSL-capable Loop	
– Loop	
– Service Order	$1.54
– Disconnection	$5.85
	$7.39

voice service is now being provisioned, selecting a new loop that meets the required qualifications is warranted.

[15] Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement shall control.

Additional Issue: Ability of both the V-CLEC and DLEC to submit orders to serve common end user[16]

Definition: V-CLEC and DLEC have entered into a line splitting arrangement and are currently serving a common end user; from time to time, either CLEC may wish to place an order to further serve that common end user.

SBC Michigan's systems only support one CLEC as the official customer of record for a particular UNE. Thus, either the V-CLEC or the DLEC will be shown as the lessor of that UNE in SBC Michigan's records. For example, the V-CLEC is the customer of record for the involved UNEs. If the V-CLEC wishes to have an agent place orders on its behalf (e.g., the DLEC), then the DLEC must issue the orders using the V-CLEC's codes (e.g., OCN, ACNA, etc.[17]) so that the order coming from the DLEC looks in all ways as if it were issued by the V-CLEC.

SBC Michigan's Operations Support Systems ("OSS") already make it possible for one CLEC to make agreements with another CLEC to pass orders on its accounts via both ordering interfaces: the WebLEX Graphical User Interface ("GUI"; also referred as "LEX") and the Electronic Data Interchange (EDI) application-to-application interface.

The SBC Michigan GUI can provide a CLEC the ability to place orders in the name of another CLEC by use of the Block IDs. For example, CLEC-A could grant authority to CLEC-B to use one of its common block user IDs in order to gain access through CLEC-B's own workstation to CLEC-A's view of LEX. Because CLEC-B has CLEC-A's block IDs, CLEC-B can issue orders and receive responses via LEX for CLEC-A. This is possible because in LEX, all orders, if submitted by a company at the ACNA level will be viewable by all users of CLEC-A's user IDs. This includes those CLEC-B users who have CLEC-A user IDs. All responses from transactions in LEX, including Rejects, Firm Order Confirmations (FOC), Jeopardy notices, Service Order Completions (SOC), and Post-to-Bill (PTB) information, will be viewable by any user associated to CLEC-A, including CLEC-B users who have CLEC-A user IDs. .

Additionally, two CLECs can achieve the same result with respect to the use of EDI. Using the same example above, CLEC-A will share information so that CLEC-B can issue orders as CLEC-A. CLEC-A will share its OCN and ACNA and any other relevant information as it relates to the ordering of products being shared between these two CLECs. When CLEC-B issues the order, it will use CLEC-A's information so that, to SBC Michigan's OSS, CLEC-B appear as CLEC-A. However, so that CLEC-B receives the responses, it will use its own EDI Trading Partner ID (TPID). This, just as in the GUI example, will allow CLEC-B to receive all responses and notifications on the orders they issue as CLEC-A, such as Rejects, FOCs, Jeopardy notices, SOCs, and PTBs.[18] SBC Michigan will route responses back to the TPID that issued the order.

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16 This scenario addresses WorldCom Issue #6.

17 OCN stands for "Operating Company Number". ACNA stands for "Access Customer Name Abbreviation".

18 Post-to-Bill (PTBs) are only for LSOR 5.01 and higher versions.

Thus, to achieve this "sharing" of an account, both CLECs must be on the same version of EDI, down to the "dot" version (e.g., LSOR 5.02).

Line Splitting vs. Line Sharing: Difference in processes for both providers to submit orders on behalf of their common end user.

The Line Sharing arrangement is more restricted than in the Line Splitting arrangement. In the line sharing arrangement, the DLEC must submit all of its requests to the voice provider (i.e., SBC Michigan); the voice provider then in turns handles issuing all of the required orders. For Line Splitting, as described above, SBC Michigan has processes in place to accept orders from both providers.

Exhibit 3

SBC Michigan's 271 Line Sharing/Line Splitting Collaborative Clarifications

The following are clarifications to SBC Michigan's March 3, 2003 Discussion Draft for Additional Line Splitting/Line Sharing Scenarios pursuant to the Michigan Public Service Commission's ("MPSC") January 13, 2003 Order in U-12320. The below clarifications are intended to respond to questions raised during the March 4-5, 2003 Michigan Line Sharing/Line Splitting Collaborative Session. Please see SBC Michigan's original Discussion Draft for a full description of the scenarios addressed below.

As discussed during the Collaborative, CLECs will/may direct further questions regarding the existing order processes to their Account Teams. CLECs who wish to request modifications to existing processes should raise the issue at the appropriate CLEC forum (Change Management or CLEC User Forum).

Scenario #5: Line Sharing to Line Splitting – Change in Splitter

During the Collaborative, some CLECs asked, per their experiences, whether the 3-LSR process works. SBC, in turn, looked into the example and found that the LSRs were submitted with various errors and were properly rejected.

The CLECs also requested that SBC Michigan clarify the ACT types used in this 3-LSR process. The ACT types documented on CLEC Online are accurate (ACT type "D" for the HFPL order, ACT type "N" for the DSL-capable loop order, and ACT type "V" for the ULS-ST order[1]). Although a new ULS-ST will be installed, SBC Michigan uses the ACT of "V" for the ULS-ST order because the telephone number of the port will be reused. The actual loop facility is also reused; however, as the HFPL only provides a CLEC with access to a portion of the loop (the high frequency), while a DSL-capable loop provides a CLEC with access to the entire loop, an ACT type of "D" is used for the HFPL and "N" is used for the DSL-capable loop.

Scenario #7: Line Splitting to Line Splitting

Once the UNEs that are used in a line splitting arrangement are established, the CLEC should follow the standard order processes for the UNE in question for all changes going forward.

In the case of the DSL-capable loop, CLEC Online contains order examples for both the change of CFA scenario and the CLEC-to-CLEC migration scenario under Ordering, General Ordering – UNE, LSR Examples, DSL PSD loop.

A request to provide a process for a change of CFA or a CLEC-to-CLEC migration for the ULS-ST port had not yet been requested. As a result, these scenarios are not currently documented online. Sample LSRs for these scenarios are provided as attachments to the e-mail transmitting this document.

[1] The ACT type for the ULS-ST is N for LSOR 4.02.

In both the change of CFA scenario and the CLEC-to-CLEC migration scenario, CLECs may relate the DSL-capable loop and ULS-ST LSRs, if desired, by populating the RPON field.

As explained during the workshop, CLECs may request modifications to these order processes through Change Management.

Scenario #8b: Line Splitting to UNE-P (arrangements cease between V-CLEC and DLEC and the collocation will no longer be used for voice)

The LSR example for this scenario was inadvertently removed from CLEC Online. SBC Michigan plans to have the LSR example back online shortly. A sample LSR is provided as an attachment to the email transmitting this document for reference.

The LSR for this request will utilize an ACT type of "V." Although a new UNE-P will be installed, SBC Michigan uses the ACT of "V" because the telephone number of the port will be reused.

The LSR must be submitted manually (i.e., fax). As this is a single-LSR process, there is no need to relate LSRs.

Exhibit 4

The CLEC Change Request (CCR) Log is posted on CLEC Online (https://clec.sbc.com/clec), under Change Management, SBC All Regions.

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-010	Covad	John Berard	Pre-Ordering (EDI, Verigate, CORBA), Ordering (LEX, EDI) **All Regions**	Pending Review in 3/2003	2/18/03
CLEC Verbatim Description: Currently SBC has versioning rules in place that are CLEC specific. This creates problems for line splitting orders as two CLEC's may be on different versions of LSOG. Rather than have the CLEC specific versioning rules, Covad requests that the rules be order specific. This would allow for CLEC's to be on different versions of LSOG/EDI and still allow for the placement of a line splitting order by the other CLEC.					
SBC Response:					
2/20/03 – New CCR added to log.					

Exhibit 5

To: Michigan Collaborative Group Members May 23, 2001

From: Thomas R. Lonergan, Director
Communications Division
Michigan Public Service Commission

Subject: AT&T's MTP Change Request

On March 23, 2001, AT&T proposed changes to Appendix A to the Michigan MTP to reflect testing relating to line sharing and line splitting. On May 7, Ameritech Michigan provided its response to AT&T's proposal. KPMG's impact assessment of the proposal was provided on May 11th. On May 18th AT&T and WorldCom provided additional comments.

Based on its review of these submissions, Staff requests that the following actions be taken.

First, Appendix A to the Michigan MTP should be modified as delineated on the attached KPMG-prepared document which reflects its May 11th impact assessment of the testing AT&T has proposed (including the line sharing to UNE-P without data scenario), the services which Ameritech has indicated it offers, and additional conversations and comments by AT&T. Staff's conclusion reflects its position that testing scenarios included in the MTP reflect products that Ameritech offers and that KPMG can therefore test. Disputes regarding Ameritech's obligation to offer certain services should be resolved in a policy-determining forum rather than in this change request procedure. KPMG should proceed to include in its test plan the testing specified in this revised Appendix A. This will require the provisioning of additional test bed accounts as discussed in KPMG's assessment but will not effect the end-date of the test.

Second, AT&T, WorldCom and Ameritech do not agree on Ameritech's obligations relating to line splitting over UNE-P as discussed in the MPSC's March 7, 2001 Order in Case No. U-12540 as well as in other related FCC orders. Apparently since each party believed its interpretation of the U-12540 to be correct, no party requested that the Commission clarify or reconsider those portions of the Commission order. As a result, certain line sharing / line splitting test scenarios cannot be addressed nor tested by KPMG. Therefore, Staff proposes that the dispute resolution process delineated in the Commission's February 9, 2000 Order in Case No. U-12320 be invoked to resolve these issues. An initial call and/or meeting will be convened by Staff to discuss these differences. Should resolution not be achieved, a joint filing should be prepared to submit to the Commission delineating the parties' differing positions as well as the effect on testing.

Should any parties have questions on these conclusions, Staff would be happy to discuss them.

Appendix A: Test Scenarios

The scenarios listed in this appendix are based on a current understanding of the products and capabilities that are likely to be available at the time the test is executed. Depending on changes in availability, the scenarios may need to be modified before the test begins. Also, it should be noted that the scenarios will include variations such as planned errors and supplements to cancel, change an order, or revise due dates.

Resale

Activity	Res. / Bus. POTS	Res./ Bus. ISDN	Centrex	Private Line	PBX
Migration from Ameritech "as is"	X	X	X		X
CLEC to CLEC migration	X				
Feature changes to existing customer	X		X		
Migration from Ameritech "as specified"	X	X			
New customer	X	X	X	X	X
Telephone number change	X				
Directory change	X		X		
Add lines / trunks / circuits	X	X	X	X	X
Suspend / restore service	X				
Disconnect (full and partial)	X	X	X	X	X
Moves (inside and outside)	X		X		
Convert line to ISDN		X			
Migrate from CLEC to Ameritech	X				
Convert POTS line to Centrex			X		

UNE

Activity	Res./ Bus. Analog Loop	Res. / Bus. xDSL Capable Loop	Line Share	Bus. DS1 Loop	Inter-office Facilility	UNE Combinations for CLEC Line Splitting
Migration from Ameritech without number porting	X	X		X		
Migration from Ameritech with LNP	X	X		X		
Migration from CLEC to CLEC	X	X				
Add new loops to existing customer	X	X		X		
Add new interoffice DS1 / DS3 facilities					X	
Purchase loops for a new customer	X	X	X	X		

Activity	Res./ Bus. Analog Loop	Res. / Bus. xDSL Capable Loop	Line Share	Bus. DS1 Loop	Inter-office Facility	UNE Combinations for CLEC Line Splitting
Disconnect (full and partial)	X	X	X	X		
Moves (inside and outside)	X			X		
Standalone directory change	X	X				
Standalone LNP	X					
Convert from UNE-P to UNE loop	X					
Convert from Resale to UNE loop	X					
Migrate data service from Ameritech to CLEC			X			
Migrate voice service from CLEC to Ameritech			X			
Purchase dark fiber					X	
Migrate from line sharing to UNE loop		X				
Purchase switch port for existing line shared retail customer						X
CLEC purchases unbundled xDSL capable loop and switch port to provide service to a new customer						X

UNE Platform

Activity	Res./Bus. POTS	Res. / Bus. ISDN
Migration from Ameritech "as is"	X	X
Migrate from CLEC to CLEC	X	
Feature changes to existing customer	X	
Migration from Ameritech "as specified"	X	X
New customer	X	X
Telephone number change	X	
Directory change	X	
Add lines / trunks / circuits	X	X
Suspend / restore service	X	
Disconnect (full and partial)	X	X
Moves (inside and outside)	X	X
Convert line to ISDN		X
Migrate from CLEC to Ameritech	X	
Convert from Resale to UNE-P	X	X
Migration from Line Share to UNE-P	X	

Stand-alone Preorder

Activity	Residence/ Business
Obtain CSRs	X
Validate customer address	X
Reserve telephone numbers	X
Loop qualification (including xDSL)	X
Inquire about product/service availability	X
Determine availability of desired due date	X
Obtain Directory Listing information	X
Channel Facility Assignment (CFA) Inquiry	X
Network Channel/Network Channel Interface (NC/NCI) Inquiry	X

UNE EEL

Activity	Res./Bus. DS0	Bus. DS1 Loop
Migrate lines from Ameritech w/o number port.	X	X
Migrate lines from Ameritech with LNP	X	X
Add new lines to existing EEL	X	X
Purchase lines for a new customer	X	X
Convert customer from Resale to UNE EEL	X	
Disconnect (full and partial)	X	X

Stand Alone Maintenance & Repair

Activity	Res./ Bus. POTS	Res./ Bus. ISDN	Centrex	Private Line	PBX	xDSL UNE - Loop	Line Share	Switch Port
Short on outside plant facility	X				X	X	X	
Open on outside plant facility	X	X				X	X	
Short on the line within the central office	X		X	X		X	X	
Open on the line within the central office	X	X	X	X	X	X	X	
Noise on line	X	X				X	X	
Echo on line	X					X	X	
Customer w/ LNP not receiving incoming calls	X							
Customer receiving incoming calls intended for another customer's number.	X						X	X
Call waiting not working	X						X	X
Repeat dialing not working	X							X
Customer cannot call 900 numbers	X							
Calls do not roll-over for customer w/ multiline hunt group	X		X					
Call forwarding not working	X							

Caller ID not working	X						X	
Pick-up group order for large centrex customer not functioning properly			X					
DS1 loop MUXed to DS3 IOF not functioning.				X				
Customer's data not operational							X	
CLEC requests MLT	X							